

JOHN RICHARD BRINSON, JR.

REG no. 76587-097



UNITED STATES PENITENTIARY - TUCSON

P.O. BOX 24550

TUCSON, AZ 85734-4550

UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA  
WESTERN DIVISION - LOS ANGELES

JOHN R. BRINSON, JR.,

MOVANT,

Crim Case No. 2:17-cr-00404-AB

v.

Civil Case No. 2:25-cv-02652-AB

UNITED STATES OF AMERICA

Respondant.

MOTION TO REQUEST EXTENSION OF  
TIME TO FILE

John Richard Brinson, Jr., Pro Se Petitioner, submits this motion to Request Extension of time to File.

On July 29, 2025, the Government filed its opposition to Petitioner's § 2255 Motion, filed March 24, 2025.

Petitioner requests additional time to file a reply. As good cause to grant this request, Petitioner submits that :

1. He is not an attorney and has no training in law;
2. He is dependent on the assistance of others to file a reply;
3. He has limited access to an institutional law library and other resources necessary to file a meaningful reply;
4. The government's response contains no fewer than thirty-three separate case citations and five references to statutes, all of which must be researched in order to compose a reply;
5. The availability of resources necessary to file a meaningful, adversarial reply is dictated by prison staff and subject to significant schedule and other considerations, in particular: staffing shortages and institutional issues, and also lockdowns, impinging on his right to file a reply.
6. The government, with its abundance of resources, was permitted four-months to file its response.

Based on the foregoing show of good cause, Petitioner respectfully requests an additional 90 days to file his reply.

Respectfully Submitted,

John Brinson  
John Richard Brinson, Jr.

Signed this 19 day of August, 2025, by  
John Richard Brinson, Jr.

### CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that I served a copy of the enclosed Motion to Request Extension of Time to File on the party named below by placing copies of the same in the institution mail system with sufficient first class postage affixed and addressed to:

United States Attorney's Office  
312 North Spring Street  
Los Angeles, CA 90012

John Brinson

John Richard Brinson, Jr.

Signed this 19 day of August, 2025, by  
John Richard Brinson, Jr.

John Richard Brinley Jr # 76587097  
United States Penitentiary - Tucson  
PO Box 24550  
Tucson, AZ 85734

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PHOENIX



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Suite Ts-134  
255 E Temple ST  
LOS ANGELES, CA 90012  
United States

90012-330934

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